

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

HON. GERSHWIN A. DRAIN
CASE No.: 19-CR-20024

D-1 NAVEEN PRATHIPATI,

Defendant. _____/

DEFENDANT NAVEEN PRATHIPATI'S SENTENCING MEMORANDUM

NOW COMES, Defendant Naveen Prathipati, by and through counsel, who submits this Sentencing Memorandum in an effort to urge this Court to grant a variance from the applicable guidelines. The guideline range said is 18 to 24 months.

I. Background and Characteristics of Naveen Prathipati - 18 U.S.C. §3553(a)(1)

Defendant acknowledges the accuracy of the personal family data set forth in the Presentence Investigation Report. However, as the Court considers a sentence that is sufficient but not greater than necessary, Mr. Prathipati asks that the Court pay particular attention to the following characteristics:

A. Mr. Prathipati is 26 years old single Indian male from Guntur, India.

The Presentence Reports indicated that he is Asian which would be incorrect. When Naveen came to this country he had hardly no family nor friends but was able to go to school full time and hold steady employment.

- B. It was the Government that encouraged Mr. Prathipati to enroll in their fictional school and employment. Because of his financial status and plans for marriage, Naveen was extremely vulnerable to the Government's scheme and accepted their terms and conditions.
- C. Naveen has lost everything because of this case including his freedom. He has been incarcerated in St. Clair County for 6 months. He has had no visitation except from his Attorney thus living in virtual isolation. He has lost his employment and car that he had purchased. He has lost the respect of his family and his marriage has been cancelled by the bride's family. He will return to India broke and in disgrace.

II. Conclusion

We are requesting this Honorable Court to sentence Mr. Prathipati to time served.

Respectfully submitted,

/s/ WRIGHT W. BLAKE
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Dated: June 18, 2019

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CERTIFICATE OF SERVICE

This is to certify that ***Defendant Naveen Prathipati's Sentencing Memorandum*** and ***Certificate of Service*** have been electronically filed with the Clerk of the Court on June 18, 2019. Notice of this filing is sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's ECF System.

Respectfully submitted,

/s/LESLIE BOWMAN
LESLIE BOWMAN